Filed 08/04/2006

## **EXHIBIT A**

## **TOPICS OF TESTIMONY**

Pursuant to Federal Rule of Civil Procedure 30(b)(6), the officer(s), director(s), managing agent(s), or other person(s) whom Defendant RS-Computer ("RSC") will designate to testify on its behalf should know or have information reasonably available regarding the facts and issues surrounding the following topics:

- 1. Advertising by you or on your behalf in the United States ("U.S.") or directed to the U.S. market during the period October 1999 to present, including, but not limited to print publications and online advertising conducted on the Internet.
  - Marketing efforts directed to the U.S. during the period October 1999 to present. 2.
- 3. Business trips to the U.S. by RSC personnel during the period October 1999 to present.
- Participation by RSC in trade shows and industry conferences in the U.S. during 4. the period October 1999 to present.
  - 5. The operations of RSC's interactive English language website.
  - 6. RSC's sales operations in the U.S. or directed to the U.S.
  - 7. RSC's relationship with Sysgen Data Ltd.
  - 8. RSC's branch office in New York.
  - 9. RSC's "Service Center" in New York.
- 10. The procedures for tracking and responding to an inquiry, originating in the U.S., concerning a product or service offered by RSC.
- 11. The procedures for tracking and responding to an inquiry, originating in the U.S., to purchase a product or service of Feitian Technologies Co., Ltd. ("Feitian").

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- 12. Shipping/exporting operations and procedures for importing RSC's products and services into the U.S.
- 13. The customer relations management tools used by or for RSC during the period October 1999 to present.
- 14. The prospect management software used by or for RSC during the period October 1999 to present.
- 15. The referral tracking procedures used by or for RSC during the period October 1999 to present.
- 16. Sales to or in the U.S. of Feitian products, including, its "ePass" and "Rockey" products during the period October 1999 to present.
- 17. Services for or on behalf of a customer located in the U.S. relating to Feitian products, including, its "ePass" and "Rockey" products during the period October 1999 to present.
- 18. Offers for sale to or in the U.S. of Feitian products, including, its "ePass" and "Rockey" products during the period October 1999 to present.
  - 19. Revenues relating to sales and services in or to the U.S. by or on behalf of RSC.
  - 20. Contacts with Feitian relating to sales and services operations in the U.S.
  - 21. Contacts with any Feitian "Solution Partner" operating in the U.S.
  - 22. Contacts with any Feitian "distributor" operating in the U.S.
  - 23. The agreements executed by or on behalf of RSC that apply Delaware law.